

**REMARKS**

Claims 1-27 are pending in this application. By this Amendment, claims 1-27 are amended.

Applicants gratefully acknowledge the courtesies extended to Applicants' representative, Ms. Jaquelin Spong, at the September 25 personal interview. The substance of the interview is incorporated into the following remarks, and constitutes Applicants' record of the interview.

Applicants submit that the amendments made to claims 1-24, to recite "a computer executing an optimum operator selection support system" are not made to distinguish over any applied art. The specification describes the optimum operator selection support system as being implemented on a computer. Therefore, the amendments to claims 1-24 do not narrow the scope of the claims, compared to the scope these claims would have had, as filed.

The Office Action rejects claims 1-13, 15-20, 22 and 24-26 and 27 under 35 U.S.C. §103(a) over Brooks (U.S. Patent No. 5,825,869). This rejection is respectfully traversed.

The Office Action asserts that Brooks discloses each element recited in independent claims 1, 5, 7 and 25-27. However, Applicants respectfully submit that Brooks does not disclose:

- 1) a document feature extraction part that extracts a plurality of documents generated by one operator from said document management part, as recited in claims 1 and 25;
- 2) a job feature extraction part that extracts features of jobs of said operator by detecting common features from a frequency of occurrence of terms in the plurality of documents extracted by said document feature extraction part, as recited in claims 1 and 25;
- 3) a task management part that analyzes job order relations, including authority levels of responsible operators, based on electronic data transmitted/received among

operators, and manages information on the job order relations, as recited in claims 5 and 26;  
or

4) a job feature extraction part that extracts features of jobs of the operators, and generates a job feature management table, as recited in claims 7 and 27.

Claims 1 and 25

Brooks discloses a call-management method and system for distributing calls to individuals, and more particularly to distributing calls among a collection of agents based upon the individual call-handling capabilities of the agents (see col. 1, lines 12-16).

The Office Action asserts that "While the Brooks reference extracts features from one document, it does not specifically teach the extraction from a plurality of documents. However, the process of extracting features from one document is so very similar to extracting features from a plurality of documents that such a slight difference does not present a new or novel functionality" (Office Action, page 3). However, Applicants submit that claim 1 recites "a document feature extraction part that extracts a plurality of documents generated by one operator." Therefore, the item extracted is a plurality of documents, as well as features of documents. Nowhere in Brooks is a document feature extraction part disclosed or suggested, that extracts a plurality of documents generated by the operator, from said document management part.

Furthermore, there is no "plurality of documents generated by one operator" disclosed in Brooks, because Brooks discloses only one document, a resume. Typically, an operator maintains a single resume, so that it is not obvious that a plurality of documents generated by an operator, should exist in Brooks.

The Office Action asserts that Brooks discloses "a job feature extraction part that extracts features of jobs of said operator by detecting common features from the frequency of occurrence of terms in the plurality of documents extracted by said document feature

extraction part". The Office Action asserts that detecting common features of a job by an operator is taught by Brooks, which recites "the closeness of a match is determined by comparing a number that is assigned to indicate the desired level of expertise regarding a call-handling need of a particular call with a number that is assigned to indicate the level of expertise possessed by the agent with regard to handling calls having a particular need." (Office Action, page 3). Therefore, the "match" described in this passage cited in the Office Action, is between the skill requirements of a call, and the skills possessed by an operator. As agreed to during the interview, Brooks does not detect the common features from a frequency of occurrence of terms in the plurality of documents of an operator, as recited in claim 1. Support for the amended claim may be found, for example, on page 20 of the specification.

Therefore, Brooks does not disclose the features recited in claims 1 and 25 of "a document feature extraction part that extracts a plurality of documents generated by one operator" or a job feature extraction part that detects common features "from a frequency of occurrence of terms in the plurality of documents extracted by said document feature extraction part."

#### Claims 5 and 26

The Office Action asserts that Brooks teaches "a task management part that analyzes job order relations". The Office Action cites column 4, lines 51-54, which recite in part "a call-management method and system for distributing calls to a plurality of individuals, such as automatic call distribution agents, including routing calls to the individuals based upon a correlation of attributes of the individuals". However, nowhere in Brooks do the job order relations include "authority levels of responsible operators", and therefore, as agreed to during the interview, this element which is recited in claims 5 and 26, is not disclosed in Brooks. Support for the amended claim may be found, for example, on page 33 of the specification.

The element of "authority levels of responsible operators" implies a ranking in terms of authority of the various operators relative to one another. The skill expression which is equated with the job order relations in the Office Action (Office Action, page 12), includes the required skills and skill levels for efficiently handling the call. However, it does not include the relative ranking between responsible operators.

Therefore, Brooks does not disclose "a task management part that analyzes job order relations, including authority levels of responsible operators."

Claims 7 and 27

The Office Action asserts that Brooks discloses a job feature extraction part, by teaching a "skill summary report organizes the data by skill expressions, rather than by agents" (see col. 6, lines 33-34 of Brooks). However, Applicants respectfully submit that Brooks does not disclose or suggest "a job feature extraction part that extracts features of jobs of the operators, and generates a job feature management table, including the names and roles of responsible operators," as recited in claims 7 and 27. Support for the amended claims may be found, for example, in the specification on page 36.

In view of the above, Brooks does not disclose the subject matter recited in independent claims 1, 5, 7 and 25-27. Claims 2-4, 8-13, 15-20, 22 and 24 depend from claim 1, and claim 6 depends from claim 5. Accordingly, Brooks does not disclose the subject matter recited in claims 1-6, 8-13, 15-20, 22 and 24-26. Applicants respectfully request that the rejection of claims 1-13, 15-20, 22 and 24-27 under 35 U.S.C. §103(a) be withdrawn.

The Office Action rejects claims 14, 21 and 23 under 35 U.S.C. §103(a) over Brooks in view of Machin (U.S. Patent No. 6,038,544). This rejection is respectfully traversed.

The Office Action admits that Brooks "does not specifically teach generating graphs, recording voice conversations or allow the operators to input comments," but that Machin teaches an operator performance evaluation system and method that rates and ranks operators.

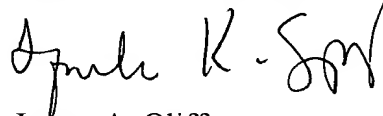
Machin also "plots performance data on a graph, allows operators to input additional information as remarks, and also receives and records input conversation as voice data in digital format." However, Applicants respectfully submit that Machin does not "detect common features from the frequency of occurrence of terms in the plurality of documents extracted by said document feature extraction part," as recited in claim 1, and therefore Machin does not remedy the deficiency of Brooks with respect to claim 1.

Claims 14, 21 and 23 depend from claim 1, and therefore the subject matter recited in claims 14, 21 and 23 is not disclosed by Machin or Brooks, either alone or in combination. Applicants therefore respectfully request that the rejection of claims 14, 21 and 23 under 35 U.S.C. §103(a) be withdrawn.

In view of the foregoing, Applicants submit that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-27 is earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the Applicants' attorney at the telephone number listed below.

Respectfully submitted,



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